

FILED

2011 SEP 26 PM 2:57

CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

BY

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CARLOS AGUIRRE

Plaintiff,

v.

NCO Financial Systems, Inc.,

Defendant.

CASE NO. **CV 11-7955-PSG (FFMx)**

ORIGINAL VERIFIED COMPLAINT
FOR VIOLATIONS OF:

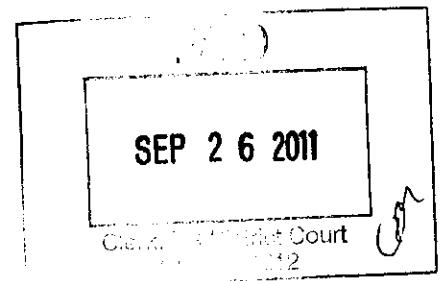
1. THE FAIR DEBT COLLECTION PRACTICES ACT (FDCPA);
2. THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT (RFDCPA).

[JURY TRIAL DEMANDED]

ORIGINAL VERIFIED COMPLAINT

Plaintiff is proceeding *pro se*. Therefore, this Court must construe this claim liberally and hold it to a less stringent standard than the Court would apply to a pleading drafted by a lawyer.

(See, e.g., *Laber v. Harvey*, 438 F.3d 404, 413 n. 3 (4th Cir. 2006).)



INTRODUCTION

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* (hereinafter "FDCPA"), and the Rosenthal Fair Debt Collection Practices Act, Cal Civ Code §1788, *et seq.* (hereinafter "RFDCPA"), both of which prohibit debt collectors from engaging in abusive, deceptive, and unfair practices.

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 15 U.S.C. §1692k(d) which grants the United States District Courts jurisdiction to hear this action without regard to the amount in controversy; and supplemental jurisdiction exists for the state law claims pursuant to 28 U.S.C. §1367; 28 U.S.C. §1331, and 28 U.S.C. §1337, with additional claims under California State Law. These claims all arise out of the same controversy and sequence of events.
3. Venue is proper pursuant to 28 U.S.C. §1391(b).

PARTIES

4. Plaintiff, Carlos Aguirre ("Plaintiff"), is a natural person residing in Los Angeles county in the state of California and is a "consumer" as defined by the FDCPA 15 U.S.C. §1692a(3) and is a "debtor" as defined by Cal Civ Code §1788.2(h).
5. At all relevant times herein, Defendant, NCO Financial Systems, Inc., ("Defendant") was a company engaged, by use of the U.S.P.S. and telephone, in the business of collecting a debt from Plaintiff which qualifies as a "debt," as defined by 15 U.S.C. §1692a(5), and a "consumer debt," as defined by Cal Civ Code §1788.2(f). Defendant regularly attempts to collect debts alleged to be due another, and therefore is a "debt collector" as defined by the FDCPA, 15 U.S.C §1692a(6), and RFDCPA, Cal Civ Code §1788.2(c).

FACTUAL ALLEGATIONS

6. At various and multiple times prior to the filing of the instant complaint, including within the one year preceding the filing of this complaint, Defendant contacted Plaintiff in an attempt to collect an alleged outstanding debt.
7. In April 20, 2011 (see "EXHIBIT A"), Defendant initially contacted Plaintiff in connection with an attempt to collect an alleged debt.

- 1 8. On average, Plaintiff received from Defendant, more than 12 collection calls on
- 2 Plaintiff's cell number 661-414-2866, from April 20, 2011 to August 30, 2011 (see
- 3 "EXHIBIT B") without validating the debt—a violation of Federal Law,
- 4 9. Pursuant to § 1692g(B) Collector must cease collection efforts until debt is validated.

5 **10. 1692g provides:**

6 (a) Within five days after the initial communication with a consumer in connection with

7 the collection of any debt, a debt collector shall, unless the following information is

8 contained in the initial communication or the consumer has paid the debt, send the

9 consumer a written notice containing

10 (1) the amount of the debt;

11 (2) the name of the creditor to whom the debt is owed;

12 (3) a statement that unless the consumer, within thirty days after receipt of the notice,

13 disputes the validity of the debt, or any portion thereof, the debt will be assumed to be

14 valid by the debt collector;

15 (4) a statement that if the consumer notifies the debt collector in writing within the thirty-

16 day period that the debt, or any portion thereof, is disputed, the debt collector will obtain

17 verification of the debt or a copy of a judgment against the consumer and a copy of such

18 verification or judgment will be mailed to the consumer by the debt collector; and

19 (5) a statement that, upon the consumer's written request within the thirty-day period,

20 the debt collector will provide the consumer with the name and address of the original

21 creditor, if different from the current creditor.

22 (b) If the consumer notifies the debt collector in writing within the thirty-day period

23 described in subsection (a) of this section that the debt, or any portion thereof, is

24 disputed, or that the consumer requests the name and address of the original creditor,

25 **the debt collector shall cease collection of the debt, or any disputed portion thereof,**

26 **until the debt collector obtains verification of the debt** or a copy of a judgment, or the

27 name and address of the original creditor, and a copy of such verification or judgment, or

28 name and address of the original creditor, is mailed to the consumer by the debt collector.

11. Pursuant to § 1692g, Failure to send the consumer a 30-day validation notice within five
- 23 days of the initial communication is a violation.
- 24 12. Defendant contacted Plaintiff with such a frequency as to constitute harassment under the
- 25 circumstances, § 1692d.
- 26 13. Defendant sent plaintiff a letter dated June 21, 2011. admitting that they had no record of
- 27 purported debt (see "EXHIBIT C"). but never ceased calling Plaintiff as required by law.

1 14. Defendant's conduct violated the FDCPA and the RFDCPA in multiple ways,
2 including but not limited to:

- 3 a) Failure to validate purported debt and *continue to call to collect on purported*
4 *debt WHILE IGNORING VALIDATION LETTER.* (see EXHIBIT D)
- 5 b) Causing a telephone to ring repeatedly or continuously
6 to annoy Plaintiff (Cal Civ Code 1788.11(d));
- 7 c) Communicating, by telephone or in person, with
8 Plaintiff with such frequency as to be unreasonable and
9 to constitute an harassment to Plaintiff under the
10 circumstances (Cal Civ Code 1788.11(e));
- 11 d) Causing Plaintiffs telephone to ring repeatedly or
12 continuously with intent to harass, annoy or abuse
13 Plaintiff (1692d(5)); and
- 14 e) Communicating with Plaintiff at 'times or places which
15 were known or should have been known to be
16 inconvenient for Plaintiff (1692c(a)(I)).

17 15. As a result of the above violations of the FDCPA and RFDCPA Plaintiff suffered and
18 continues to suffer injury to Plaintiff's feelings, personal humiliation, embarrassment,
19 mental anguish, emotional distress and Defendant is liable to Plaintiff for Plaintiff's actual
20 damages, statutory damages, costs and attorney's fees.

21 **COUNT I: VIOLATION OF FAIR DEBT**
22 **COLLECTION PRACTICES ACT**

23 16. Plaintiff reincorporates by reference all of the preceding paragraphs.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant
26 for the following:

- 27 A. Declaratory judgment that Defendant's conduct violated the
28 FDCPA;
- B. Actual damages;
- C. Statutory damages;
- D. Costs and reasonable attorney's fees; and,
- E. For such other and further relief as may be just and proper.

**COUNT II: VIOLATION OF ROSENTHAL
FAIR DEBT COLLECTION PRACTICES ACT**

13. Plaintiff reincorporates by reference all of the preceding paragraphs.

14. To the extent that Defendant's actions, counted above, violated the RFDCPA, those actions were done knowingly and willfully.

15. Further, §1788.17 of the RFDCPA mandates that every debt collector collecting or attempting to collect a consumer debt shall comply with the provisions of Sections 1692b to 1692j, inclusive, of, and shall be subject to the remedies in Section 1692k of, Title 15 of the United States Code statutory regulations contained within the FDCPA, 15 U.S. C. §1692d, and §1692d(5).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant for the following:

- A. Declaratory judgment that Defendant's conduct violated the RFDCPA;
- B. Actual damages;
- C. Statutory damages for willful and negligent violations;
- D. Costs and reasonable attorney's fees,
- E. For such other and further relief as may be just and proper.

PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY

Respectfully submitted on

09-23-2011

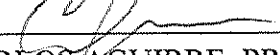
By: 
CARLOS AGUIRRE, PRO PER

EXHIBIT A



Invoice Number Account Number Date Due Page
 0976206745 470533187-00001 Past Due 6 of 64

Detail for Luis Aguirre: 661-414-2866

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
4/17	4:27P	724-444-7444	Off-Peak	N&W	Valencia CA	Gibsonia PA	94	---	---	---
4/18	8:44A	818-429-0367	Peak	M2MAIlow	Pearblosso CA	Incoming CL	3	---	---	---
4/18	10:47A	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	6	---	---	---
4/18	11:12A	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:31A	818-419-3759	Peak	M2MAIlow	San Fernan CA	Incoming CL	1	---	---	---
4/18	11:35A	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:36A	818-837-3840	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:38A	818-837-3840	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	5	---	---	---
4/18	11:44A	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	11:57A	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	12:47P	818-837-3840	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	12:51P	818-837-3840	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	1:23P	818-837-3840	Peak	PlanAIlow	Northridge CA	Sfn Sfn CA	2	---	---	---
4/19	11:45A	818-645-9205	Peak	PlanAIlow	Northridge CA	Incoming CL	1	---	---	---
4/19	12:01P	818-645-9205	Peak	PlanAIlow	Northridge CA	Incoming CL	2	---	---	---
4/19	6:26P	619-397-5485	Peak	PlanAIlow	Valencia CA	Incoming CL	27	---	---	---
4/19	6:55P	818-741-6162	Peak	PlanAIlow	Valencia CA	Sfn Sfn CA	2	---	---	---
4/19	7:12P	818-365-5386	Peak	PlanAIlow	Santa Clar CA	Sfn Sfn CA	1	---	---	---
4/19	8:37P	323-702-0098	Peak	PlanAIlow	Palmdale CA	Incoming CL	14	---	---	---
4/20	9:03A	800-956-4638	Peak	PlanAIlow	Pearblosso CA	Incoming CL	1	---	---	---
4/20	9:04A	818-741-6162	Peak	PlanAIlow	Pearblosso CA	Sfn Sfn CA	2	---	---	---
4/20	3:52P	661-964-8486	Peak	M2MAIlow	Sylmar CA	Snc Nhrs CA	3	---	---	---
4/20	4:12P	661-964-8486	Peak	M2MAIlow	Pacoima CA	Incoming CL	1	---	---	---
4/20	4:26P	818-741-6162	Peak	PlanAIlow	Sylmar CA	Sfn Sfn CA	8	---	---	---
4/20	4:58P	818-741-6162	Peak	PlanAIlow	Mission HI CA	Sfn Sfn CA	3	---	---	---
4/20	5:01P	760-518-5867	Peak	M2MAIlow	Mission HI CA	Vista CA	1	---	---	---
4/20	5:03P	818-741-6162	Peak	PlanAIlow	Mission HI CA	Sfn Sfn CA	2	---	---	---
4/20	5:05P	818-837-3840	Peak	PlanAIlow	Mission HI CA	Sfn Sfn CA	1	---	---	---
4/20	5:06P	818-837-3840	Peak	PlanAIlow	Mission HI CA	Sfn Sfn CA	1	---	---	---
4/20	5:11P	818-741-6162	Peak	PlanAIlow	Mission HI CA	Incoming CL	2	---	---	---
4/20	5:13P	760-518-5867	Peak	M2MAIlow	San Fernan CA	Vista CA	1	---	---	---
4/20	5:39P	818-741-6162	Peak	PlanAIlow	Mission HI CA	Incoming CL	1	---	---	---
4/20	5:40P	818-741-6162	Peak	PlanAIlow	Mission HI CA	Incoming CL	3	---	---	---
4/20	5:48P	661-964-8486	Peak	M2MAIlow	Mission HI CA	Incoming CL	1	---	---	---
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4/20	6:33P	661-964-8486	Peak	M2MAIlow, CallWait	Valencia CA	Incoming CL	1	---	---	---
4/20	6:49P	707-399-6964	Peak	PlanAIlow	Valencia CA	Frlid-Suis CA	2	---	---	---
4/20	7:10P	818-741-6162	Peak	PlanAIlow	Valencia CA	Incoming CL	4	---	---	---
4/20	7:59P	661-964-8486	Peak	M2MAIlow	Santa Clar CA	Incoming CL	1	---	---	---
4/20	8:20P	661-964-8486	Peak	M2MAIlow	Canyon Cou CA	Snc Nhrs CA	1	---	---	---
4/20	8:55P	818-419-3759	Peak	M2MAIlow	Acton CA	Incoming CL	6	---	---	---
4/20	9:36P	818-419-3759	Off-Peak	N&W	Pearblosso CA	Van Nuys CA	7	---	---	---
4/20	10:17P	818-216-9000	Off-Peak	N&W	Pearblosso CA	Van Nuys CA	1	---	---	---
4/21	10:10A	661-964-8486	Peak	M2MAIlow	Pearblosso CA	Snc Nhrs CA	1	---	---	---
4/21	4:31P	310-207-9699	Peak	PlanAIlow	Pearblosso CA	Incoming CL	9	---	---	---

EXHIBIT B

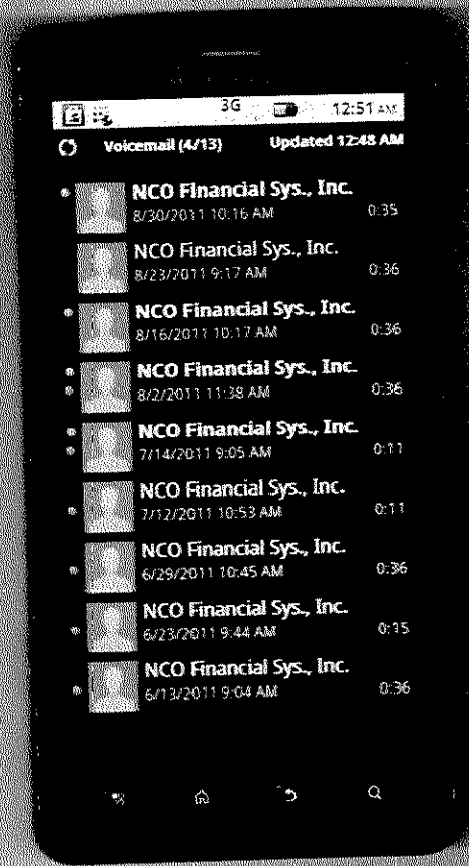


Invoice Number Account Number Date Due Page
 0976206745 470533187-00001 Past Due 6 of 64

Detail for Luis Aguirre: 661-414-2866

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
4/17	4:27P	724-444-7444	Off-Peak	N&W	Valencia CA	Gibsonia PA	94	---	---	---
4/18	8:44A	818-429-0367	Peak	M2MAIlow	Pearblosso CA	Incoming CL	3	---	---	---
4/18	10:47A	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	6	---	---	---
4/18	11:12A	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:31A	818-419-3759	Peak	M2MAIlow	San Fernan CA	Incoming CL	1	---	---	---
4/18	11:35A	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:36A	818-837-3840	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	11:38A	818-837-3840	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	5	---	---	---
4/18	11:44A	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	11:57A	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	1	---	---	---
4/18	12:47P	818-837-3840	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	12:51P	818-837-3840	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	2	---	---	---
4/18	1:23P	818-837-3840	Peak	PlanAllow	Northridge CA	Sfn Sfn CA	2	---	---	---
4/19	11:45A	818-645-9205	Peak	PlanAllow	Northridge CA	Incoming CL	1	---	---	---
4/19	12:01P	818-645-9205	Peak	PlanAllow	Northridge CA	Incoming CL	2	---	---	---
4/19	6:26P	619-397-5485	Peak	PlanAllow	Valencia CA	Incoming CL	27	---	---	---
4/19	6:55P	818-741-6162	Peak	PlanAllow	Valencia CA	Sfn Sfn CA	2	---	---	---
4/19	7:12P	818-365-5386	Peak	PlanAllow	Santa Clar CA	Sfn Sfn CA	1	---	---	---
4/19	8:37P	323-702-0098	Peak	PlanAllow	Palmdale CA	Incoming CL	14	---	---	---
4/20	9:03A	800-956-4638	Peak	PlanAllow	Pearblosso CA	Incoming CL	1	---	---	---
4/20	9:04A	818-741-6162	Peak	PlanAllow	Pearblosso CA	Sfn Sfn CA	2	---	---	---
4/20	3:52P	661-964-8486	Peak	M2MAIlow	Sylmar CA	Sncs Nhcs CA	3	---	---	---
4/20	4:12P	661-964-8486	Peak	M2MAIlow	Pacoima CA	Incoming CL	1	---	---	---
4/20	4:26P	818-741-6162	Peak	PlanAllow	Sylmar CA	Sfn Sfn CA	8	---	---	---
4/20	4:58P	818-741-6162	Peak	PlanAllow	Mission HI CA	Sfn Sfn CA	3	---	---	---
4/20	5:01P	760-518-5867	Peak	M2MAIlow	Mission HI CA	Vista CA	1	---	---	---
4/20	5:03P	818-741-6162	Peak	PlanAllow	Mission HI CA	Sfn Sfn CA	2	---	---	---
4/20	5:05P	818-837-3840	Peak	PlanAllow	Mission HI CA	Sfn Sfn CA	1	---	---	---
4/20	5:06P	818-837-3840	Peak	PlanAllow	Mission HI CA	Sfn Sfn CA	1	---	---	---
4/20	5:11P	818-741-6162	Peak	PlanAllow	Mission HI CA	Incoming CL	2	---	---	---
4/20	5:13P	760-518-5867	Peak	M2MAIlow	San Fernan CA	Vista CA	1	---	---	---
4/20	5:39P	818-741-6162	Peak	PlanAllow	Mission HI CA	Incoming CL	1	---	---	---
4/20	5:40P	818-741-6162	Peak	PlanAllow	Mission HI CA	Incoming CL	3	---	---	---
4/20	5:48P	661-964-8486	Peak	M2MAIlow	Mission HI CA	Incoming CL	1	---	---	---
4/20	6:32P	661-964-8486	Peak	M2MAIlow	Valencia CA	Sncs Nhcs CA	1	---	---	---
4/20	6:33P	661-964-8486	Peak	M2MAIlow, CalWait	Valencia CA	Incoming CL	1	---	---	---
4/20	6:49P	707-399-6964	Peak	PlanAllow	Valencia CA	Frlid-Suis CA	2	---	---	---
4/20	7:10P	818-741-6162	Peak	PlanAllow	Valencia CA	Incoming CL	4	---	---	---
4/20	7:59P	661-964-8486	Peak	M2MAIlow	Santa Clar CA	Incoming CL	1	---	---	---
4/20	8:20P	661-964-8486	Peak	M2MAIlow	Canyon Cou CA	Sncs Nhcs CA	1	---	---	---
4/20	8:55P	818-419-3759	Peak	M2MAIlow	Acton CA	Incoming CL	6	---	---	---
4/20	9:36P	818-419-3759	Off-Peak	N&W	Pearblosso CA	Van Nuys CA	7	---	---	---
4/20	10:17P	818-216-9000	Off-Peak	N&W	Pearblosso CA	Van Nuys CA	1	---	---	---
4/21	10:10A	661-964-8486	Peak	M2MAIlow	Pearblosso CA	Sncs Nhcs CA	1	---	---	---
4/21	4:31P	310-207-9699	Peak	PlanAllow	Pearblosso CA	Incoming CL	9	---	---	---





Invoice Number Account Number Date Due Page
1008425056 470533187-00001 Past Due 6 of 41

Detail for Luis Aguirre: 661-414-2866

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
8/05	12:07P	818-741-6162	Peak	PlanAllow	Pearblosso CA	Incoming CL	2	---	---	---
8/05	12:26P	818-979-4122	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/05	1:16P	818-493-0187	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/05	1:25P	818-741-6162	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/05	1:32P	661-492-9732	Peak	PlanAllow	Palmdale CA	Lancaster CA	8	---	---	---
8/05	1:53P	818-741-6162	Peak	PlanAllow	Pearblosso CA	Incoming CL	13	---	---	---
8/05	2:12P	818-741-6162	Peak	PlanAllow	Pearblosso CA	Incoming CL	3	---	---	---
8/05	2:34P	818-741-6162	Peak	PlanAllow	Pearblosso CA	Incoming CL	3	---	---	---
8/05	3:41P	818-493-0187	Peak	PlanAllow	Liano CA	Sfn Sfn CA	1	---	---	---
8/05	3:42P	818-493-0187	Peak	PlanAllow	Palmdale CA	Sfn Sfn CA	2	---	---	---
8/05	5:48P	818-493-0187	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/05	7:33P	818-741-6162	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/05	9:00P	818-741-6162	Peak	N&W,PlanAllow,Span	Pearblosso CA	Sfn Sfn CA	4	---	---	---
8/06	12:05P	661-904-9569	Off-Peak	N&W	Pearblosso CA	Incoming CL	1	---	---	---
8/06	12:51P	661-492-9732	Off-Peak	N&W	Pearblosso CA	Lancaster CA	5	---	---	---
8/07	1:24A	818-365-4021	Off-Peak	N&W	Palmdale CA	Sfn Sfn CA	1	---	---	---
8/07	2:00P	661-298-5550	Off-Peak	N&W	Palmdale CA	Incoming CL	7	---	---	---
8/07	2:10P	661-298-5550	Off-Peak	N&W	Pearblosso CA	Incoming CL	1	---	---	---
8/07	2:46P	661-298-5550	Off-Peak	N&W	Pearblosso CA	Scca Sgcc CA	14	---	---	---
8/07	3:40P	661-298-5550	Off-Peak	N&W	Palmdale CA	Incoming CL	2	---	---	---
8/07	4:58P	818-979-4122	Off-Peak	N&W	Palmdale CA	Incoming CL	4	---	---	---
8/07	6:24P	661-298-5550	Off-Peak	N&W	Palmdale CA	Scca Sgcc CA	1	---	---	---
8/07	9:23P	818-645-9205	Off-Peak	N&W	Palmdale CA	Van Nuys CA	3	---	---	---
8/07	9:54P	800-642-4720	Off-Peak	N&W	Pearblosso CA	Toll-Free CL	1	---	---	---
8/07	9:56P	661-298-5550	Off-Peak	N&W	Pearblosso CA	Scca Sgcc CA	1	---	---	---
8/07	9:57P	800-642-4720	Off-Peak	N&W	Palmdale CA	Toll-Free CL	3	---	---	---
8/08	9:38A	661-964-8486	Peak	M2MAllow	Pearblosso CA	Scca Nhos CA	1	---	---	---
8/08	9:49A	818-645-9205	Peak	PlanAllow	Pearblosso CA	Van Nuys CA	1	---	---	---
8/08	10:16A	818-645-9205	Peak	PlanAllow	Pearblosso CA	Van Nuys CA	1	---	---	---
8/08	11:18A	818-645-9205	Peak	PlanAllow	Palmdale CA	Incoming CL	3	---	---	---
8/08	11:25A	818-645-9205	Peak	PlanAllow	Pearblosso CA	Van Nuys CA	2	---	---	---
8/08	11:50A	216-282-0011	Peak	PlanAllow	Palmdale CA	Incoming CL	1	---	---	---
8/08	1:01P	818-581-5093	Peak	PlanAllow	Santa Clar CA	Incoming CL	1	---	---	---
8/08	1:02P	818-581-5093	Peak	PlanAllow	Santa Clar CA	Incoming CL	9	---	---	---
8/08	2:12P	661-964-8486	Peak	M2MAllow	Los Angele CA	Incoming CL	2	---	---	---
8/08	5:00P	818-419-3759	Peak	M2MAllow	Van Nuys CA	Incoming CL	2	---	---	---
8/08	8:06P	661-964-8486	Peak	M2MAllow	Santa Clar CA	Scca Nhos CA	2	---	---	---
8/08	8:09P	661-964-8486	Peak	M2MAllow	Santa Clar CA	Incoming CL	1	---	---	---
8/09	9:08A	800-956-4638	Peak	PlanAllow	Pearblosso CA	Incoming CL	1	---	---	---
8/09	11:02A	323-702-0098	Peak	PlanAllow	Palmdale CA	Incoming CL	10	---	---	---
8/09	11:13A	323-702-0098	Peak	PlanAllow	Pearblosso CA	Incoming CL	1	---	---	---
8/09	11:45A	661-816-8190	Peak	PlanAllow	Pearblosso CA	Palmdale CA	2	---	---	---
8/09	12:15P	818-741-6162	Peak	PlanAllow	Palmdale CA	Incoming CL	3	---	---	---
8/09	12:44P	323-702-0098	Peak	PlanAllow	Pearblosso CA	Lsan DA 12 CA	2	---	---	---
8/09	12:58P	818-741-6162	Peak	PlanAllow	Littlerock CA	Sfn Sfn CA	1	---	---	---

Control # 30000535-00010955

Order #: 4501 Copy #: 01



Invoice Number Account Number Date Due Page

0940639145 470533187-00001 Past Due 9 of 83

Detail for Luis Aguirre: 661-414-2866

Voice, continued

Date	Time	Number	Rate	Usage Type	Origination	Destination	Min.	Airtime Charges	Long Dist/ Other Chgs	Total
12/25	11:32A	661-904-9569	Off-Peak	N&W	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/25	12:06P	714-497-7430	Off-Peak	N&W	Newhall CA	Orange CA	8	---	---	---
12/25	3:48P	800-639-7000	Off-Peak	N&W	Newhall CA	Toll-Free CL	1	---	---	---
12/25	3:53P	661-904-9569	Off-Peak	N&W	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/25	6:55P	818-741-6162	Off-Peak	N&W	Canyon Cou CA	Sfn Sfn CA	1	---	---	---
12/25	6:58P	661-298-5550	Off-Peak	N&W	Newhall CA	Snca Sgcc CA	1	---	---	---
12/25	8:07P	818-741-6162	Off-Peak	N&W	Canyon Cou CA	incoming CL	3	---	---	---
12/25	9:31P	714-497-7430	Off-Peak	N&W	Canyon Cou CA	incoming CL	2	---	---	---
12/26	12:55P	661-350-6008	Off-Peak	N&W	Canyon Cou CA	incoming CL	5	---	---	---
12/26	1:32P	661-904-6805	Off-Peak	N&W	Canyon Cou CA	incoming CL	1	---	---	---
12/26	1:52P	661-348-2091	Off-Peak	N&W	Canyon Cou CA	incoming CL	7	---	---	---
12/26	1:59P	661-348-2091	Off-Peak	N&W	Canyon Cou CA	incoming CL	63	---	---	---
12/26	3:02P	661-904-6305	Off-Peak	N&W	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/26	3:05P	661-904-6805	Off-Peak	N&W	Canyon Cou CA	Snca Nhcs CA	2	---	---	---
12/26	3:07P	714-497-7430	Off-Peak	N&W	Canyon Cou CA	Orange CA	2	---	---	---
12/26	5:04P	661-904-9569	Off-Peak	N&W	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/26	6:53P	866-579-8583	Off-Peak	N&W	Canyon Cou CA	incoming CL	1	---	---	---
12/26	7:38P	411-000-0000	Off-Peak	N&W	Canyon Cou CA	411Search CL	1	---	1.99	1.99
12/26	7:39P	661-252-5599	Off-Peak	N&W	Canyon Cou CA	Snca Sgcc CA	1	---	---	---
12/26	7:47P	411-000-0000	Off-Peak	N&W	Canyon Cou CA	411Search CL	1	---	1.99	1.99
12/26	11:46P	818-741-6162	Off-Peak	N&W	Canyon Cou CA	incoming CL	2	---	---	---
12/26	11:51P	818-741-6162	Off-Peak	N&W	Canyon Cou CA	incoming CL	1	---	---	---
12/27	11:54A	661-904-6805	Peak	M2MAIlow	Newhall CA	Snca Nhcs CA	1	---	---	---
12/27	12:30P	888-475-6741	Peak	PlanAllow	Newhall CA	incoming CL	3	---	---	---
12/27	12:37P	714-497-7430	Peak	M2MAIlow	Newhall CA	Orange CA	35	---	---	---
12/27	2:45P	661-904-6805	Peak	M2MAIlow	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/27	2:46P	661-904-6805	Peak	M2MAIlow	Newhall CA	Snca Nhcs CA	3	---	---	---
12/27	3:48P	801-727-0607	Peak	PlanAllow	Newhall CA	Draper UT	1	---	---	---
12/27	6:23P	661-904-6805	Peak	M2MAIlow	Newhall CA	Snca Nhcs CA	2	---	---	---
12/28	8:24A	661-904-6805	Peak	M2MAIlow	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/28	8:28A	619-397-5485	Peak	PlanAllow	Newhall CA	Chufavista CA	6	---	---	---
12/28	9:09A	714-497-7430	Peak	M2MAIlow	Canyon Cou CA	Orange CA	3	---	---	---
12/28	9:12A	714-497-7430	Peak	M2MAIlow	Canyon Cou CA	incoming CL	1	---	---	---
12/28	10:04A	661-255-0167	Peak	PlanAllow	Newhall CA	Snca Nhcs CA	18	---	---	---
12/28	10:26A	661-904-6805	Peak	M2MAIlow	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/28	10:28A	714-497-7430	Peak	M2MAIlow	Canyon Cou CA	Orange CA	1	---	---	---
12/28	10:37A	951-205-7130	Peak	M2MAIlow	Canyon Cou CA	Riverside CA	10	---	---	---
12/28	11:39A	661-333-4428	Peak	PlanAllow	Canyon Cou CA	Bkfd Main CA	1	---	---	---
12/28	11:41A	661-333-4428	Peak	PlanAllow	Canyon Cou CA	Bkfd Main CA	1	---	---	---
12/28	11:43A	661-255-0167	Peak	PlanAllow	Newhall CA	Snca Nhcs CA	6	---	---	---
12/28	11:50A	661-904-6805	Peak	M2MAIlow	Newhall CA	incoming CL	1	---	---	---
12/28	3:16P	510-846-5735	Peak	M2MAIlow	Canyon Cou CA	Okid Almd CA	8	---	---	---
12/28	3:42P	818-837-3840	Peak	PlanAllow	Canyon Cou CA	Sfn Sfn CA	4	---	---	---
12/28	3:50P	661-904-6805	Peak	M2MAIlow	Canyon Cou CA	Snca Nhcs CA	1	---	---	---
12/28	3:59P	818-979-4122	Peak	PlanAllow	Newhall CA	Sfn Sfn CA	2	---	---	---

EXHIBIT C



507 Prudential Road
Horsham, PA 19044
1-866-305-9426

Office Hours: 8:00 a.m. - 9:00 p.m. Monday through Thursday
8:00 a.m. - 5:00 p.m. Friday, 8:00 a.m. - 12:00 noon Saturday

June 21, 2011

Carlos Aguirre
P.O. Box 500048
Palmdale, CA 93591

Dear Carlos Aguirre:

Thank you for your recent communication. I can assure you that we are committed to assisting you; however, we have been unable to locate the matter you have referenced from the information we have been provided. Please provide us with further identifying information such as your social security number, a copy of your most recent credit bureau report reflecting NCO's listing, the telephone number that you claim NCO is calling in addition to the telephone number your claim NCO is calling from in order to further research your claim and the billing address of the account. A copy of any correspondence you may have received from us would also be of assistance. Kindly contact me at the above address with this information.

Thank you for your anticipated cooperation regarding this request.

Very truly yours,

A handwritten signature in black ink, appearing to be "LE", written over a horizontal line.

Louis Elliott
Consumer Affairs Representative I

This is an attempt to collect a debt. Any information obtained will be used for that purpose. This is a communication from a debt collector.

Calls to or from NCO Financial Systems, Inc. may be monitored or recorded for quality assurance.

(EXHIBIT D)

Date: June 6, 2011

**NOTICE AND DEMAND TO CEASE AND DESIST COLLECTION ACTIVITIES
PRIOR TO VALIDATION OF PURPORTED DEBT**

From : Carlos Aguirre
P.O. Box 500048
Palmdale, Ca 93591

To: NCO Financial Systems
507 Prudential Rd.
Horsham, PA 19044-2308

REF: Alleged debt claimed by: American Express

Alleged Account # ????
Alleged Balance \$?????

This is an offer to fully pay/discharge the attached claim of debt on the condition that the claiming parties comply with this notice within 30 days of receipt of this correspondence.

This notice is my demand to "cease and desist" collection--including calling my telephones.

This letter is being sent to you in response to calls I have received from this company. Be advised that this is not a refusal to pay, but a notice sent pursuant to the Fair Debt Collection Practices Act, 15 USC 1692g Sec. 809 (b) that your claim is disputed and validation is requested.

Validation made pursuant to the above named Title and Section. I respectfully request that your offices provide me with competent evidence that I have any legal obligation to pay you.

Please provide me with the following:

What the money you say I owe is for;
Explain and show me how you calculated what you say I owe;
Provide me documents of any papers that show I agreed to pay what you say I owe;
Provide a verification or copy of any judgment if applicable;
Identify the original creditor;
Prove the Statute of Limitations has not expired on this account

If your offices are able to provide the proper documentation as requested, I will require at least 30 days to investigate this information and during such time all collection activity must cease and desist.

If your offices fail to respond to this validation request within 30 days from the date of your receipt, all references to this account must be deleted and completely removed from my credit file and a copy of such deletion request shall be sent to me immediately.

I hereby request, in writing, that no telephone contact be made by your offices to my home, cell or to my place of employment.

All future communications with me MUST be done in writing and sent to the address noted in this letter.

Thank You

Carlos Aguirre



Date: June 6, 2011

Verification

In Witness, Whereof, Knowing the law of bearing false witness before God and Men, I Solemnly aver the above is true and correct and is presented to the Defendant in good faith and is not interposed for the purpose of delay or any other purpose with which-- I, the Plaintiff, have herein stated and declared.

That I have further read the above Complaint and know the contents thereof to be true; and the same is true of my own knowledge, except to the matters which are therein stated on my information and belief, and as to those matters I believe them to be true.

Dated: 09-23-2011

By: 
Carlos Aguirre, Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Philip S. Gutierrez and the assigned discovery Magistrate Judge is Frederick F. Mumm.

The case number on all documents filed with the Court should read as follows:

CV11- 7955 PSG (FFM~~x~~)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

CARLOS AGUIRRE

38587 154th Street East

Palmdale, California 93591

(661) 414-2866 Cell

FOR OFFICE USE ONLY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CARLOS AGUIRRE

PLAINTIFF(S)

v.

NCO Financial Systems, Inc.

DEFENDANT(S).

CASE NUMBER

CV11-7955 - PSG

SUMMONS

TO: DEFENDANT(S): NCO Financial Systems, Inc.

A lawsuit has been filed against you.

FOR OFFICE USE ONLY

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, CARLOS AGUIRRE, whose address is 38587 154th Street East, Palmdale, California 93591. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: 9-26-11By: CHRIS SAWYER

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. ALL 60 days by Rule 12(a)(3)].

FOR OFFICE USE ONLY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) CARLOS AGUIRRE	DEFENDANTS NCO Financial Systems, Inc.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) CARLOS AGUIRRE 38587 154th Street East Palmdale, California 93591 (661) 414-2866 Cell	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ TO BE DETERMINED

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

15 USC 1692 VIOLATION OF THE FAIR DEBT PRACTICES ACT

VII. NATURE OF SUIT (Place an X in one box only.)					
OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related <input type="checkbox"/> 630 Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
 If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
 If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
LOS ANGELES	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	PENNSYLVANIA

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
LOS ANGELES	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date 09-23-2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))